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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.

Case No. 08-13555 (JMP)

Chapter 11

Jointly Administered

## VERIFIED STATEMENT OF BAKER & HOSTETLER LLP PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019(a)

Baker & Hostetler LLP ("Baker Hostetler") hereby submits this verified statement (the "Verified Statement") pursuant to Federal Rule of Bankruptcy Procedure 2019(a) in connection with the above-captioned chapter 11 cases (the "Cases") of Lehman Brothers Holdings Inc. and its debtor affiliates (together, the "Debtors") and respectfully states as follows:

- 1. For certain specified matters or issues, Baker Hostetler represents in the Cases the creditors listed on Exhibit A hereto and certain other entities that may be creditors of one or more of the Debtors (together, the "Represented Parties").
- 2. Those Represented Parties that are not listed on Exhibit A have either not yet been finally determined to be creditors of the Debtors or have not yet determined to appear in the Cases. Such parties include entities that may or may not have claims against one or more of the Debtors based upon securities transactions once netting is completed and other entities that have sought from Baker Hostetler advice on existing financial transactions with one or more of the Debtors or general advice regarding the Cases. Baker Hostetler will supplement this statement as necessary as the status of additional Represented Parties becomes clear.
- 3. Each of the Represented Parties may hold, whether directly or indirectly, claims against and/or interests in certain of the Debtors arising out of agreements with certain of the Debtors. The specific nature and amount of these claims and/or interests have not yet been finally determined and may be set forth in proofs of claim or interests to be filed in the Cases.
- 4. Each of the Represented Parties on Exhibit A separately requested representation by Baker Hostetler in connection with the Cases and to file a limited objection or joinder of other objections to the Debtors' Motion for an Order Pursuant to Sections 105 and 365 of the Bankruptcy Code to Establish Procedures for the Settlement or Assumption and Assignment of Prepetition Derivative Contracts on behalf of each of the Represented Parties in the amounts and nature as set forth in each limited objection.
- 5. The undersigned hereby certifies that this Verified Statement is true and accurate, to the best of the undersigned's knowledge and belief. Baker Hostetler reserves the right to revise and supplement this statement.

102597823.3

Dated: December 31, 2008 Respectfully submitted,

## /s/ Elyssa S. Kates

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## **EXHIBIT A**

- 1. Linn Energy, LLC JPMorgan Chase Tower 600 Travis, Suite 5100 Houston, TX 77002
- Deer Park Road Corporation 1875 Ski Time Square, Suite 102 P.O. Box 776429 Steamboat Springs, CO 80477
- 3. City View Plaza, S.E. P.O. Box 9066590 San Juan, PR 00906-6590
- 4. Advanced Graphic Printing, Inc. P.O. Box 9066602
  San Juan, PR 00906-6602